Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of language in 73.3555(a)(1) regarding the application of Local Station Ownership limitations. Specifically, TTS urges the FCC to (a) eliminate any ownership restriction on AM stations in any market by any licensee; and (b) eliminate any ownership restrictions of any kind on any licensee outside the Top-100 rated markets.

AM stations are struggling to survive in any market; as evidenced by the number of licenses being surrendered on almost a daily basis. For there to be any restriction on who can own an AM station is to further accelerate the death of the AM service as we know it. There is no logical reason there should be any Regulation which would deter someone from being able to own an AM station in any location.

Smaller markets should be categorically exempt from any Local Station Ownership limitations, simply because the current rules do not permit even the logical ownership that can take place. In non-rated markets, the "contour method" of market definition can severely restrict or prevent ownership in adjoining communities of even single signals in a community. The local economies should dictate the viability of small market group ownership, not discriminatory FCC regulations.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services